

From: [Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts](#) on behalf of infrastructure.noreply@govcms.gov.au
To: [aviationconsumer](#)
Subject: submission to: Aviation Consumer Protections – primary legislation [SEC=OFFICIAL]
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Attachments: [letter-impact-of-aviation-consumer-protections-consultation-on-smaller-airports-the-hon-catherine-king-mp.pdf](#)

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Yarriambiack Shire Council

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Consultation name

Aviation Consumer Protections – primary legislation

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“A strong and connected community prioritising sustainable and innovative approaches to support the wellbeing of our people, economy and environment.”

01 October 2025

Hon Catherine King MP
Minister for Infrastructure, Transport, Regional Development and Local Government
PO Box 6022
Parliament House
CANBERRA ACT 2600
Email: Minister.King@mo.infrastructure.gov.au

Dear Minister,

RE: IMPACT OF AVIATION CONSUMER PROTECTIONS CONSULTATION ON SMALLER AIRPORTS

Yarriambiack Shire Council welcomes the opportunity to respond to the Aviation Consumer Protections Consultation Paper released on 8 September 2025. While we support the Government’s objective to strengthen consumer protections in aviation, we are deeply concerned that the framework, as currently proposed, will impose significant, disproportionate and counterproductive burdens on smaller airports such as ours.

The majority of Australian airports are regional or remote, essential to their communities for health care, education, tourism, and economic opportunity. Yet around 60 per cent of council-owned airports operate at a financial loss each year, requiring subsidies from already stretched local governments. The collapse of Bonza and uncertainty surrounding Rex Airlines has only heightened the fragility of regional aviation. While grant programs such as the Regional Airports Program (RAP) and the Regional Airport Upgrade Program (RAUP) provide welcome short-term relief, there remains no sustainable, long-term funding mechanism to support critical works at these airports.

At the Warracknabeal and Hopetoun Aerodromes, we manage 0 passengers annually with a workforce of 2 staff members—one overseeing operations and one maintaining the grounds. We are already operating at a financial loss, as no fees are charged for take-offs or landings. Planned works such as security fence upgrades and improved signage would be put at risk if we were required to divert funds into compliance levies and administration. Our aerodromes play a critical role in supporting emergency services, flight training, and the local Aero Club, and additional financial burdens will directly undermine our community’s safety, connectivity, and resilience.

Against this backdrop, adding new compliance and levy obligations risks diverting scarce resources away from practical improvements such as safety upgrades and runway maintenance. This could undermine productivity by creating duplication, confusion and administrative inefficiency — at a time when the Government has rightly identified reducing red tape and boosting productivity as national priorities.

The framework is also inconsistent in its treatment of industry participants. Airports would be captured twice. The first is where a direct consumer relationship exists (for example car parking) and the second, through accessibility obligations. By contrast, government agencies, such as Airservices Australia and the Australian Border Force who are entirely excluded.

Accessibility is already comprehensively regulated under existing legislation, including the Disability Discrimination Act 1992, the Disability Standards for Accessible Public Transport 2002, and associated human rights frameworks — all of which are currently under review. In addition, airports and airlines are subject to the Australian Consumer Law, which governs cancellations, refunds and service guarantees. Airports are further working with Government on the development of aviation-specific disability standards, with more than 145 initiatives underway across the country.



“A strong and connected community prioritising sustainable and innovative approaches to support the wellbeing of our people, economy and environment.”

Introducing an additional consumer protection framework risks confusing passengers, duplicating obligations and undermining productivity — shifting effort into multiple overlapping compliance regimes rather than delivering genuine service improvements.

There is no other country in the world that has a consumer scheme that requires the airports to also participate. The consultation paper itself acknowledges that airlines — not airports — are responsible for the majority of operations captured by the proposed framework. Without a minimum threshold, the proposed scheme would impose unsustainable compliance costs on smaller airports while delivering little, if any, additional benefit to consumers.

We urge the Government to:

- Exempt airports with fewer than one million passengers annually from the framework, consistent with international best practice such as the UK’s Aviation ADR scheme, which covers 91.7% of passengers by including only larger airports.
- Ensure that costs are proportionate, with levies primarily recovered from airlines, who hold the direct contractual relationship with passengers.
- Align the framework with existing legislative and regulatory obligations to prevent duplication and productivity loss.
- Provide flexibility and staged implementation to avoid further undermining the financial viability of regional airports.

Strengthening consumer protections should not come at the expense of regional connectivity, community access or national productivity. We ask for a reconsideration of the current approach to ensure reforms are effective, proportionate and sustainable for airports like ours.

Yours sincerely,



Tammy Smith
Chief Executive Officer